

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:20-MJ-416

V.

Hon. Sally J. Berens
U.S. Magistrate Judge

KALEB FRANKS,

Defendant.

**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO FILE
UNDER RESTRICTED ACCESS**

Defendant, through counsel, moves the Court for leave to file Mr. Franks' written proffer of facts and memo on detention issues under restricted access in the above-captioned case. The government does not oppose the request to file under restricted access. Defendant's request is supported by good cause: the filing at issue contains information related to parties unaffiliated with these proceedings, as well as sensitive medical information. In the spirit of Federal Rule of Criminal Procedure 49.1, restricted-access filing would provide vital privacy protection for this material. *See, e.g.*, Fed. R. Crim. P. 49.1(e).

Date: October 12, 2020

SCOTT GRAHAM PLLC

By: /s/ Scott Graham
 Scott Graham
 Attorney for Defendant

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IT IS SO ORDERED

Date: _____